

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re	)	Case No. 20-17404
	)	
RONALD JEROME HAMPTON and	)	Chapter 7
MYRTLE HAMPTON,	)	
	)	Hon. Donald R. Cassling
Debtors.	)	
	)	Hearing Date: January 25, 2022 at 9:30 a.m.

**NOTICE OF MOTION**

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on Tuesday, January 25, 2022 at 9:30 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present the **Trustee's Motion to Approve Sale of South Holland Property**, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.**

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and password.** The meeting ID for this hearing is 161 414 7941\_ and the password is 619. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Ronald R. Peterson

RONALD R. PETERSON, not individually  
but solely as chapter 7 trustee for the above-  
captioned debtor.

Ronald R. Peterson  
353 N. Clark Street  
Chicago, Illinois 60654-3456  
PH: 312/923-2981  
FAX: 312/840-7381

Dated: January 3, 2022

**CERTIFICATE OF SERVICE**

I, Ronald Peterson, an attorney, certify that on January 3, 2022, I caused the foregoing Notice of Motion and Trustee's Motion to Approve Sale of South Holland Property to be served on all counsel of record listed on the Court's ECF Service List by the Court's ECF service, a copy of which is attached, and all of the parties on the Service List by First Class U.S. Mail, postage prepaid and properly addressed.

/s/ Ronald R. Peterson

Ronald R. Peterson

**SERVICE LIST**

**VIA ECF NOTIFICATION:**

- **Rae Kaplan** rkaplan@financialrelief.com, yrodriguez@financialrelief.com, fbichl@financialrelief.com, kaplan.myecfmail@gmail.com, i-got-notices@financialrelief.com, jcabrales@financialrelief.com, R49775@notify.bestcase.com
- **Patrick S Layng** USTPRegion11.ES.ECF@usdoj.gov

**VIA U.S. MAIL:** [See attachment]

Label Matrix for local noticing  
0752-1

Case 20-17404  
Northern District of Illinois  
Eastern Division  
Thu Dec 30 12:35:59 CST 2021

Fifth Third Bank, National Association  
5001 Kingsley Dr.  
MD 1MOBBW  
Cincinnati, OH 45227-1114

Barclays Bank Delaware  
P.O. Box 8803  
Wilmington, DE 19899-8803

Capital One  
P.O. Box 30281  
Salt Lake City, UT 84130-0281

Citibank, N.A.  
5800 S Corporate Pl  
Sioux Falls, SD 57108-5027

Comenity Bank/Carson's  
P.O. Box 182789  
Columbus, OH 43218-2789

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

First Bankcard  
P.O. Box 2557  
Omaha, NE 68103-2557

GS Bank USA  
P.O. Box 45400  
Salt Lake City, UT 84145-0400

Internal Revenue Service  
2970 Market Street  
Mail Stop 5-Q30.133  
Philadelphia, PA 19104-5002

Capital One Auto Finance, a division of Capital One  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave.  
Oklahoma City, OK 73118-7901

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Best Buy/CBNA  
P.O. Box 6497  
Sioux Falls, SD 57117-6497

Capital One Auto Finance  
P.O. Box 30285  
Salt Lake City, UT 84130-0285

Citibank/CBNA  
P.O. Box 6217  
Sioux Falls, SD 57117-6217

D. Patrick Mullarkey  
Tax Division (DOJ)  
P.O. Box 55, Ben Franklin Station  
Washington, DC 20044-0055

FNB Omaha  
P.O. Box 3412  
Omaha, NE 68197-0001

Franciscan Alliance  
c/o MiraMed  
360 East 22nd Street  
Lombard, IL 60148-4924

Goldman Sachs Bank, USA  
by AIS InfoSource, LP as Agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Internal Revenue Service  
P.O. Box 7317  
Philadelphia, PA 19101-7317

Capital One Auto Finance, a division of Capital One  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Bridgecrest  
7300 East Hampton Avenue  
Mesa, AZ 85209-3324

Capital One Auto Finance,  
a division of Capital One, NA Dept  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Citicards CBNA  
P.O. Box 6217  
Sioux Falls, SD 57117-6217

Discover Bank  
Discover Products Inc  
PO Box 3025  
New Albany OH 43054-3025

Fifth Third Bank  
5050 Kingsley Drive  
Cincinnati, OH 45227-1115

Franciscan Health Munster  
c/o MiraMed Revenue Group  
360 East 22nd Street  
Lombard, IL 60148-4924

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Internal Revenue Service\*  
P.O. Box 7346  
Philadelphia, PA 19101-7346

(p)JPMORGAN CHASE BANK N A  
 BANKRUPTCY MAIL INTAKE TEAM  
 700 KANSAS LANE FLOOR 01  
 MONROE LA 71203-4774

JPMorgan Chase Bank, N.A.  
 s/b/m/t Chase Bank USA, N.A.  
 c/o National Bankruptcy Services, LLC  
 P.O. Box 9013  
 Addison, Texas 75001-9013

JPMorgan Chase Bank, N.A.  
 s/b/m/t Chase Bank USA, N.A.  
 c/o Robertson, Anschutz & Schneid, P.L.  
 6409 Congress Avenue, Suite 100  
 Boca Raton, FL 33487-2853

Mercury Card/FB&T  
 1415 Warm Springs Road  
 Columbus, GA 31904-8366

Professional Clinical Laboratories  
 2434 Interstate Plaza Drive  
 Hammond, IN 46324-2671

Quantum3 Group LLC as agent for  
 Comenity Bank  
 PO Box 788  
 Kirkland, WA 98083-0788

Radius Global Solutions, LLC  
 P.O. Box 390846  
 Minneapolis, MN 55439-0846

Rocket Loans  
 1001 Woodward  
 Detroit, MI 48226-1904

SYNCB/TJX  
 P.O. Box 965015  
 Orlando, FL 32896-5015

Specialized Loan Services, LLC  
 8742 Lucent Blvd.  
 Ste. 300  
 Littleton, CO 80129-2386

Syncb/Amazon  
 P.O. Box 965015  
 Orlando, FL 32896-5015

Syncb/J.C. Penney  
 P.O. Box 965007  
 Orlando, FL 32896-5007

Syncb/PPC  
 P.O. Box 965005  
 Orlando, FL 32896-5005

Syncb/PPMC  
 P.O. Box 965005  
 Orlando, FL 32896-5005

Syncb/Sam's  
 P.O. Box 965005  
 Orlando, FL 32896-5005

Syncb/Walmart  
 P.O. Box 30281  
 Salt Lake City, UT 84130-0281

Syncb/swtwtr  
 P.O. Box 965036  
 Orlando, FL 32896-5036

Synchrony Bank  
 c/o PRA Receivables Management, LLC  
 PO Box 41021  
 Norfolk, VA 23541-1021

THD/CBNA  
 P.O. Box 6497  
 Sioux Falls, SD 57117-6497

WF Bank, N.A.  
 P.O. Box 14517  
 Des Moines, IA 50306-3517

Wells Fargo Bank, N.A.  
 PO Box 10438, MAC F8235-02F  
 Des Moines, IA 50306-0438

Myrtle Hampton  
 19713 Sequoia Avenue  
 Chicago Heights, IL 60411-6830

Ronald Jerome Hampton  
 19713 Sequoia Avenue  
 Chicago Heights, IL 60411-6830

Discover Financial Services  
P.O. Box 15316  
Wilmington, DE 19850

Internal Revenue Service  
230 S. Dearborn, MS 4401  
Attn: D.R. Calhoun-1248182  
Chicago, IL 60604

(d) Internal Revenue Service  
575 N. Pennsylvania Street  
M/S SB380  
Indianapolis, IN 46204

JPMCB Card  
P.O. Box 15369  
Wilmington, DE 19850

End of Label Matrix  
Mailable recipients 55  
Bypassed recipients 0  
Total 55

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re	)	Case No. 20-17404
	)	
RONALD JEROME HAMPTON and	)	Chapter 7
MYRTLE HAMPTON	)	
	)	Hon. Donald R. Cassling
Debtor.	)	
	)	Hearing Date: January 25, 2022 at 9:30 a.m.

**TRUSTEE’S MOTION TO APPROVE SALE OF CERTAIN REAL PROPERTY**

Ronald R. Peterson, as chapter 7 trustee (the “**Trustee**”) of the above-captioned debtors (the “**Debtors**”), hereby moves for entry of an order under 11 U.S.C. § 363(b) authorizing the Trustee to sell the estate’s interest in a certain parcel of real property back to Debtor Ronald Jerome Hampton (“**Mr. Hampton**”). In support of the Motion, the Trustee respectfully states as follows:

**BACKGROUND**

1. On September 22, 2020 (the “**Petition Date**”), the Debtors filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Illinois (the “**Court**”). The Trustee is the duly appointed and acting chapter 7 trustee of the Debtors’ estate.

2. Prior to the Petition Date, Mr. Hampton owned a 100% fee simple interest in the parcel of real property commonly known as 15223 Wabash Avenue, South Holland, Illinois 60473 (PIN: 29-10-304-042-0000) (the “**Property**”).

3. The Property is a single-family residence with three bedrooms and one bathroom. Based on the Trustee’s review of the Property and electronic appraisal databases, the Trustee estimates the Property has a value of between \$60,000 and \$70,000.

4. However, according to the Debtors' schedules, the Property is subject to a senior mortgage held by Specialized Loan Services, LLC (the "**Mortgage**") in the amount of \$63,420 as of the Petition Date.

5. Subject to this Court's approval, to liquidate the Property, the Trustee has agreed to, in exchange for a lump sum cash payment of \$13,000, execute a quitclaim deed conveying the estate's interest in the Property back to Mr. Hampton (the "**Sale**").

6. For the avoidance of doubt, the Trustee is not seeking to sell the Property free and clear of the Mortgage or any other claim, interest, or encumbrance.

7. In the interest of time, Mr. Hampton has agreed to deliver a cashier's check in the amount of \$13,000 to the Trustee upon the filing of this Motion. In the event the Court declines to approve the Sale, the Trustee agrees to promptly return such funds to Mr. Hampton.

#### **RELIEF REQUESTED**

8. By this Motion, pursuant to section 363 of the Bankruptcy Code, the Trustee requests approval of and authority to effectuate the Sale.

#### **BASIS FOR RELIEF REQUESTED**

9. Section 363(b) of the Bankruptcy Code permits "[t]he trustee, after notice and a hearing, [to] use, sell, or lease, other than in the ordinary course of business, property of the estate[.]" 11 U.S.C. § 363(b). Sales outside the ordinary course of business pursuant to section 363(b) are proper upon notice and a hearing where the trustee has a sound business reason for the proposed sale. *Fulton State Bank v. Schipper (In re Schipper)*, 933 F.2d 513, 515 (7th Cir. 1991); *In re Efoora, Inc.*, 472 B.R. 481, 488-92 (Bankr. N.D. Ill. 2012). Under this standard, the "trustee has considerable discretion when it comes to the sale of estate assets, and that discretion is entitled to 'great judicial deference' as long as a sound business reason is given." *Efoora*, 472 B.R. at 488.

10. Here, cause exists to approve the proposed Sale. As noted above, based on the Trustee's review of the Property and the Mortgage, the Trustee does not believe the Property has anything more than *de minimis* value to the estate. The Trustee further believes the cost of conducting a broader marketing process for the Property would materially reduce the value of the estate's recoverable interest in the Property. Moreover, even if third-party buyer could be found, the Trustee would be responsible for property taxes and maintenance costs in the interim. For all of these reasons, the Trustee believes the estate and all creditors will be best served by permitting the Trustee to sell the estate's interest in the Property to Mr. Hampton in exchange for a lump sum payment of \$13,000.

WHEREFORE, the Trustee respectfully requests entry of an order: (a) authorizing the Trustee to, in exchange for a \$13,000 lump sum payment from Mr. Hampton, execute a quitclaim deed transferring the estate's interest in the Property to Mr. Hampton; (b) authorizing the Trustee and Mr. Hampton to take any ministerial steps necessary to effectuate the Sale; and (b) granting such other relief as the Court deems just and appropriate.

Dated: January 3, 2022

Respectfully submitted,

/s/ Ronald R. Peterson

RONALD R. PETERSON, not individually  
but solely as chapter 7 trustee for the above-  
captioned debtors.

Ronald R. Peterson  
353 N. Clark Street  
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FAX: 312/840-7381